

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

v. :

KALEIL ISAZA TUZMAN, OMAR :
AMANAT, and IRFAN AMANAT, :

Defendants. :
: :
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No. S8 15 Cr. 536 (PGG)

**DEFENDANT KALEIL ISAZA TUZMAN'S NOTICE OF MOTION
FOR DISCOVERY AND A HEARING ON THE GOVERNMENT'S CONDUCT**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, the Declaration of Silvia L. Serpe and the exhibits thereto, the Declaration of Kaleil Isaza Tuzman and the exhibits thereto, the Second Declaration of Amanda L. Blaurock and the exhibits thereto, and the Declaration of Jonathan B. New and the exhibits thereto, Kaleil Isaza Tuzman respectfully moves this Court before the Honorable Paul G. Gardephe, United States District Judge, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order compelling the Government to provide limited discovery, and for a hearing regarding his government misconduct defense.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the Court's January 18, 2017 scheduling order (Dkt. #221), the Government's opposition papers are due on March 7, 2017, and Mr. Isaza Tuzman's reply, if any, is due on March 17, 2017.

Dated: February 14, 2017
New York, New York

/s/ Silvia L. Serpe
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